

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

UNITED STATES

v.

KINGSLEY R. CHIN

Defendant.

No. 1:21-cr-10256-IT

**GOVERNMENT’S AND KINGSLEY CHIN’S JOINT STATEMENT
AND MOTION TO SET SCHEDULE FOR PRETRIAL MATTERS**

Pursuant to the Court’s instruction that the parties confer concerning a new schedule in advance of the May 19, 2025 trial date for defendant Kingsley Chin, and inform the Court as to whether pending motions *in limine* or oppositions thereto will be resubmitted following the severing and rescheduling of the trials, the government and Dr. Chin respectfully submit the following information and requests:¹

1. The government has informed defendants that it intends to seek a Superseding Indictment, to be filed by April 1, 2025. While the Superseding Indictment will charge both defendants, the government and Dr. Chin agree that the previously-ordered severance will apply to the Superseding Indictment.

2. With respect to the government’s pending motions *in limine*, the government intends to file amended or supplemental motions *in limine* not later than April 11, 2025, consistent with the schedule proposed below. In light of the severance and anticipated Superseding Indictment, Dr. Chin intends to file revised oppositions for purposes of his trial, to

¹ The government anticipates making a separate filing at a later date concerning Mr. Humad’s trial, which is scheduled for July 28, 2025.

replace the responses that he and Mr. Humad previously filed jointly, in accordance with the schedule set forth below.

3. In light of the severance and the anticipated Superseding Indictment, Dr. Chin intends to amend certain motions *in limine* previously filed jointly with Mr. Humad (ECF Nos. 249, 251, 255, 257), and to file any amended motions *in limine* for purposes of his trial, in accordance with the schedule set forth below.

4. In light of the severance and the Superseding Indictment, the government and Dr. Chin respectfully request that the Court set the following deadlines for pre-trial submissions and disclosures:

- a. Government's amended disclosures to Dr. Chin (Section I of the Court's pretrial order) by **April 2, 2025**.
- b. New or amended motions *in limine*, amended proposed *voir dire* questions, and amended proposed jury instructions (Section II.A. of the Court's pretrial order) filed by **April 11, 2025**.
- c. Dr. Chin's amended disclosures to government (Section III of the Court's pretrial order) by **April 25, 2025**.
- d. New or amended oppositions to motions *in limine* (including Dr. Chin's revised oppositions to government's previously filed motions) (Section II.B. of the Court's pretrial order) filed by **May 2, 2025**.
- e. Final pre-trial filings (Section IV of the Court's pretrial order) filed by **May 2, 2025**.

Respectfully submitted,

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CERTIFICATE OF SERVICE

The undersigned certifies that this document, filed on March 28, 2025, through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing.

/s/ Joshua L. Solomon